

REMARKS

Favorable reconsideration of this application is respectfully requested.

Claims 15-24 are pending in this application. Claims 15-16, 18-22, and 24 were rejected under 35 U.S.C. §103(a) as unpatentable over U.S. patent 5,566,278 to Patel et al. (herein “Patel”) in view of U.S. patent 6,208,427 to Lee. Claims 17 and 23 were rejected under 35 U.S.C. §103(a) as unpatentable over Patel in view of Lee and further in view of U.S. patent 6,462,756 to Hansen et al. (herein “Hansen”).

Addressing the above-noted rejections, those rejections are traversed by the present response.

Initially, applicants note each of the independent claims is amended by the present response to clarify features recited therein. Specifically, independent claim 1 now clarifies that the printer driver is configured to be booted based on a received command “to print a document”. Independent claim 15 further clarifies that the image on the screen is displayed “based on and after receiving the command to print a document” as a preview of printing. The other independent claims are similarly amended. The above-noted claim features are believed to be fully supported by the original specification, for example see page 4, lines 1-6.

The claim amendments clarify a structure in the invention that is believed not to have been properly considered in the Office Action. The claims are directed to features of a printer driver performing editing processes on image data after a command to print a document has been issued. That is, in the claimed invention after a command to print a document has been executed and has been received by a printer driver, then in the present invention certain editing processes can still be performed. That feature is believed to clearly differ from the applied art.

As discussed in the present specification with respect to the background, when an image to be printed is edited, a document can be processed in an application.¹ However, the applicants of the present recognized that such an editing in an application cannot be simply performed and processed by a printer driver, and therefore the claimed invention provides a novel printing image forming apparatus and method enabling an operator to simply edit, on a printer driver, a document on a computer and to print the document.² Thereby, in the present apparatus and method an application is first activated to issue an order to print an original document, and then a printer driver is activated to start to operate.³ Then, various steps are taken by the printer driver to allow the printing of the document. Such features of the performing the noted operations in a printer driver of a printing image forming apparatus are believed to clearly distinguish over the applied art to Patel and Lee.

In the present invention an editing process on image data is performed on the printer driver instead of on applications, unlike the prior art. More specifically, display of the image data on a screen is performed on the printer driver after a command is issued to print a document in the prior art; however, the editing process is not performed on the printer driver in the prior art.

Patel merely discloses a system in which an application program 102 can operate in conjunction with a printer driver 110. However, such features are unrelated to the claimed invention.

As discussed above, a conventional operation allows the display of image data on a screen performed on a printer driver after a command is issued to print a document. However, editing processes are not performed on a printer driver in conventional systems. Patel appears no more relevant than such conventional systems in that Patel does not disclose

¹ Specification at page 1, lines 19-21.

² Specification at page 2, lines 4-9.

³ Specification at page 4, lines 1-4.

or suggest performing any editing processes on printer driver 110, after a command is issued to print a document. Patel appears to utilize the application program 102 for any such editing processes, as in the conventional art.

In fact the Office Action appears to recognize that the printer driver 110 in Patel does not disclose any of the operations directed to the printer driver as recited for example in independent Claim 15, particularly the operations of the displaying, inserting, forming, and further displaying. Such deficiencies on Patel appear recognized in the Office Action.⁴ To overcome the deficiencies in Patel the outstanding Office Action cites Lee in particular at column 3, lines 25-55. However, Lee cannot overcome the deficiencies in Patel with respect to the claimed features.

Lee is directed to a personal digital system (PDA) that includes a fax modem 160 that transmits and receives fax data to allow the fax data to be transmitted, to thereby be printed.⁵

First, applicants note the teachings in Lee are completely unrelated to the teachings in Patel and one of ordinary skill in the art would not even combine such teachings.

Patel is directed to an object-oriented printing system. Lee is directed to a PDA. Such systems are completely unrelated and incompatible. Lee discloses sending information to a printer for printing. Thus, the only possible combination of the teachings of Lee in view of Patel would be for Lee to transmit data from the PDA therein to an object oriented printing system such as in Patel. However, such a combination of teachings is not even related to the claimed features. That is, such a combination of teachings would not involve and could not involve taking the features in Lee and utilizing such features in the object oriented printing system of Patel. That is the case because Lee is directed to a PDA that transmits data to a printing system and Patel is directed to a printing system itself.

⁴ Office Action of February 24, 2005, page 3, first full paragraph.

⁵ See for example Lee at column 3, lines 1-3 and 61 *et seq.*

In such ways, no combination of teachings of Patel in view of Lee meets or suggests the claimed features.

Further, even combining the teachings in Lee to the teachings in Patel would not fully meet the claim limitations.

Lee also differs significantly from the claimed features. More specifically, Lee is also not directed to operations performed in a *printer driver after a print command is issued*. In Lee the actual printing operation is performed by a fax machine and a control in Lee is part of a personal digital assistant (PDA), which is not a printing image forming apparatus, that merely allows fax transmission. Lee is also clearly not directed to the claimed operations performed by a printer driver.

In such ways, even if the teachings in Lee were combined with the teachings in Patel, it would still not result in a *printer driver* performing the editing operations *after a print command is received*, as recited in the claims.

Stated another way, as Lee does not even disclose allowing a printer driver to perform any specific editing operations, if the teachings in Lee were combined with the teachings in Patel it would merely result in the application program 102 in Patel at most being able to perform functions as in Lee. In Lee it is the PDA and not the printer driver that performs the noted operations. Similarly in Patel it is the application program 102 and not the printer driver 110 that performs the editing operations. Thus, if the teachings in Lee were combined with the teachings in Patel at most that would result in the application program 102 in Patel performing editing operations.

Such a combination of teachings in Lee in view of Patel would not result in a *printer driver* performing editing operations after receiving a command to print a document, as recited in the claims.

In maintaining the outstanding rejection, the Advisory Action of April 12, 2005,

states:

Lee disclosed, A Personal Digital Assistant (PDA) printer and printing method. The printer includes a user interface that allows a user, through a display, to select a fax note, which is stored in memory; insert/remove fax headers, set margins, and input fax transmission instructions. The printer includes a memory that stores fax notes fax header insertion/removal instructions, and fax note margin instructions, as taught at the Abstract and further illustrated at col. 2, lines 25-55, wherein a printing method featured a user interface through the display, controlling and editing process, as taught at col. 2, lines 25-55. *In ordered for the printer and printing features work together; it would of been obvious to one of an ordinary skill in the art to understand that a printer driver has to be embedded with the system in order to control all the editing and processing features.*

It would have been obvious to a person of ordinary skill in the art at the time the invention was made to have modified Lee' teaching into Patel's to provide a way, wherein displaying an original document on a screen as a preview of printing; receiving, at least one of a text, an image, and a graphic to be inserted into an image of the displayed original document from a user; receiving a position specified by the user on the displayed image on the screen so as to form a space for inserting the at least one of the text, image, and graphic; inserting the at least one of the text, image, and graphic into the formed space; and displaying a combined image on the screen. One of the ordinary skills in the art would have been motivated to perform such a modification to provide the printing system includes objects that provide queries for device identification, optimized imaging, printer status, data transfer, and control methods such as a grafport and printer drivers are provided for each printer type within the operating system. Thus, an application not only need not worry about the particular printer/computer combination with which it is to operate, but also need not have a built in document formatting capability, as taught by '278 at Abstract (i.e.... An object-oriented printing system includes objects that provide query, data transfer, and control methods...).

Therefore claims 15-24, remain rejected. [Emphasis Added.]

In response to the above-noted basis for the rejection, it appears that the Office Action is misunderstanding the nature of a printer driver. Specifically, as noted above, one basis for

maintaining the outstanding rejection relies on the teachings of Lee and states in “[order] for the printer and printing features [to] work together, it would have been obvious to one of an ordinary skill in the art to understand that a printer driver has to be embedded with the system in order to control all of the editing and processing features”. That statement is factually incorrect. Conventionally an application, such as a word processor, allows editing and processing features for information to be printed. A printer driver conventionally does not allow such editing features.

In the claimed invention, after a print command is issued, i.e. after for example a word processor or other application has allowed editing and processing of a document to be printed, the document is sent to a printer driver. Conventionally at that point no further editing has been executed. The present invention, contrary to such a conventional approach, allows editing within the printer driver. It is not the case that in Lee a printer driver would have to be embedded to control editing of processing features. Applications, such as word processing programs, allow such editing and processing features. In fact, Lee discloses sending information from the PDA to a printer, and in that case in the system in Lee the printer would have the printer driver, as in Lee merely the document to be printed is sent.

In such ways, the outstanding rejection misunderstands the claimed features.

In view of these foregoing comments, applicants respectfully submit the claims as currently written distinguish over the combination of teachings of Lee in view of Patel.

Moreover, no teachings in Hansen are cited to overcome the above-noted deficiencies of Patel in view of Lee.

Further, the teachings in Hansen are directed to a system and method for managing production printing workflow and are unrelated to the teachings in Lee. Lee again is not directed to a printer or any type of printer system, and thus Lee would have no use for the system of managing production printing workflow as in Hansen.

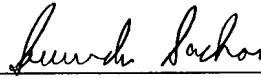
Thereby, no further teachings in Hansen are seen to overcome the above-noted deficiencies of Patel in view of Lee.

In view of these foregoing comments, applicants respectfully submit the claims as currently written distinguish over the outstanding rejections.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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